Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 1 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 1 of 23

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF

Protective Order

AMERICA

17 Cr. 350 (KBF) S1 17 Cr. 350 (KBF)

- V. -

RAZHDEN SHULAYA, et al.

Defendants.

Upon the application of the United States of America, with the consent of the undersigned counsel, and the defendants having requested discovery under Fed. R. Crim. P. 16, the Court hereby finds and orders as follows:

- 1. **Disclosure Material.** The Government has made and will make disclosure to the defendants of documents, objects and information, including electronically stored information ("ESI"), pursuant to Federal Rule of Criminal Procedure 16, 18 U.S.C. § 3500, and the Government's general obligation to produce exculpatory and impeachment material in criminal cases, all of which will be referred to herein as "disclosure material." The Government's disclosure material may include material that (i) affects the privacy, confidentiality and business interests of individuals and entities not named as parties in this case; (ii) would impede, if prematurely disclosed, the Government's ongoing investigation of uncharged individuals; (iii) would risk prejudicial pretrial publicity if publicly disseminated; and (iv) that is not authorized to be disclosed to the public or disclosed beyond that which is necessary for the defense of this criminal case.
- 2. Sensitive Disclosure Material. Certain of the Government's disclosure material, referred to herein as "sensitive disclosure material," contains information that identifies, or could

United States v. Shulaya, et al.

17 Cr. 350 (KBF) Protective Order

lead to the identification of, witnesses who may be subject to intimidation or obstruction, and

whose lives, persons, and property, as well as the lives, persons, and property of loved ones, will

be subject to risk of harm absent the protective considerations set forth herein. The Government's

designation of material as sensitive disclosure material will be controlling absent contrary order of

the Court.

3. Good Cause. There is good cause for entry of the protective order set forth herein.

Accordingly it is hereby Ordered:

4. Disclosure material shall not be disclosed by the defendants or each of his defense

counsel, including any successor counsel ("the defense") other than as set forth herein, and shall

be used by the defense solely for purposes of defending this action. The defense shall not post any

disclosure material on any Internet site or network site to which persons other than the parties

hereto have access, and shall not disclose any disclosure material to the media or any third party

except as set forth below.

5. Disclosure material may be disclosed by counsel to:

(a) Personnel for whose conduct counsel is responsible, i.e., personnel employed by or

retained by counsel, as needed for purposes of defending this action;

(b) Prospective witnesses for purposes of defending this action;

(c) Any court-appointed Coordinating Defense Attorney ("CDA"), his or her staff, and

any third party vendors he or she retains.

United States v. Shulaya, et al.

17 Cr. 350 (KBF)

Protective Order

6. The defense shall provide a copy of this Order to prospective witnesses and persons

retained by counsel to whom the defense has disclosed disclosure material or the Government's

ESI production. All such persons shall be subject to the terms of this Order. Defense counsel shall

maintain a record of what information has been disclosed to which such persons.

7. The Government may authorize, in writing, disclosure of disclosure material beyond

that otherwise permitted by this Order without further Order of this Court.

8. This Order does not prevent the disclosure of any disclosure material in any hearing or

trial held in this action, or to any judge or magistrate judge, for purposes of this action. However,

sensitive disclosure material pertinent to any motion before the Court should initially be filed under

seal, absent consent of the Government or Order of the Court. All filings should comply with the

privacy protection provisions of Fed. R. Crim. P. 49.1.

Disclosure and Protection of Seized ESI

9. The Government has advised that information that may be subject to disclosure in this

case may be contained within ESI that the Government has seized, pursuant to warrants issued

during the course of the investigation, such as ESI seized from various cell phones.

10. The Government is authorized to disclose to any CDA and counsel for the defendants,

for use solely as permitted herein, the entirety of such seized ESI as the Government believes may

contain disclosure material ("the seized ESI disclosure material"). Any CDA, defendants, their

defense counsel, and personnel for whose conduct defense counsel is responsible, i.e., personnel

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 4 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 4 of 23

United States v. Shulaya, et al.

17 Cr. 350 (KBF)

Protective Order

employed by or retained by counsel, may review the seized ESI disclosure material to identify

items pertinent to the defense. They shall not further disseminate or disclose any portion of the

seized ESI disclosure material except as otherwise set forth under this Order.

11. This Order places no restriction on a defendant's use or disclosure of ESI that originally

belonged to the defendant.

Return or Destruction of Material

12. Except for disclosure material that has been made part of the record of this case, the

defense shall return to the Government or securely destroy or delete all disclosure material,

including the seized ESI disclosure material, within 30 days of the expiration of the period for

direct appeal from any verdict in the above-captioned case; the period of direct appeal from any

order dismissing any of the charges in the above-captioned case; or the granting of any motion

made on behalf of the Government dismissing any charges in the above-captioned case, whichever

date is later.

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 5 of 23

United States v. *Shulaya, et al.* 17 Cr. 350 (KBF) Protective Order

Retention of Jurisdiction

13. The provisions of this order shall not terminate at the conclusion of this prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

AGREED AND CONSENTED TO:

JOON H. KIM Acting United States Attorney

| y: Andrew C. Adams Andrew M. Thomas Assistant United States Attorneys | Date: 6/23/2017 |
|-----------------------------------------------------------------------|-----------------|
| Counsel for defendant Razhden Shulaya | Date: |
| G 16 16 1 C 1 T 1 Dehoveshvili | Date: |
| Counsel for defendant Zurab Dzhanashvili | Date: |
| Counsel for defendant Akaki Ubilava | Date: |
| Counsel for defendant Hamlet Uglava | Date: |
| Counsel for defendant Mamuka Chaganava | Date: |
| Counsel for defendant Mikheil Toradze | |

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 6 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 6 of 23

United States v. Shulaya, et al.

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|---------------------------------------------|-------|
| Counsel for defendant Aytandil Kanadashvili | Date: |
| Counsel for defendant Avtandii Kanadashviii | |
| Counsel for defendant Nazo Gaprindashvili | Date: |
| | Date: |
| Counsel for defendant Artur Vinokurov | |
| Counsel for defendant Evgheni Melman | Date: |
| | Date: |
| Counsel for defendant Timur Suyunov | |
| Counsel for defendant Zurab Buziashvili | Date: |
| | Date: |
| Counsel for defendant Girogi Lomishvili | Date: |
| Counsel for defendant Azer Arslanouk | Date. |
| Counsel for defendant Ivan Afanasyev | Date: |
| Counsel for defendant tvan Atlantasyev | Date: |
| Counsel for defendant Denis Savgir | |
| Counsel for defendant Bakai Marat-Uulu | Date: |
| | Date: |
| Counsel for defendant Andriy Petrushyn | |
| Counsel for defendant Diego Gabisonia | Date: |

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 7 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 7 of 23

| United States v. Shulaya, | et | al |
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| 17 Cr. 350 (KBF) | | |
| Protective Order | | |

| | Date: | |
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| Counsel for defendant Levan Makashvili | | |
| | Date: | |
| Counsel for defendant Sergey Saraidarov | | |
| | Date: | |
| Counsel for defendant Vache Hovhannisyan | | |
| | Date: | |
| Counsel for defendant Denys Davydov | | |
| | Date: | |
| Counsel for defendant Erekle Kereselidze | | |
| | Date: | |
| Counsel for defendant Alex Mitselmakher | | |
| | Date: | |
| Counsel for defendant Yuriy Lerner | | |
| | Date: | |
| Counsel for defendant Avtandil Khurtsidze | | |
| | | |
| | | |
| ORDERED: | | |
| ted: New York, New York | | |
| , 2017 | | |

HONORABLE KATHERINE B. FORREST UNITED STATES DISTRICT JUDGE

United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

| | Date: | |
|---------------------------------------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Counsel for defendant Avtandil Kanadashvili | | |
| | Date: | |
| Counsel for defendant Nazo Gaprindashvili | | |
| | Date: | |
| Counsel for defendant Artur Vinokurov | | |
| | Date: | |
| Counsel for defendant Evgheni Melman | | |
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| Counsel for defendant Timur Suyunov | | |
| | Date: | |
| Counsel for defendant Zurab Buziashvili | | |
| | Date: | |
| Counsel for defendant Girogi Lomishvili | | |
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| Counsel for defendant Azer Arslanouk | | |
| \rightarrow | Date: | 6-20-17 |
| Counsel for defendant Ivan Afanasyev | | |
| | Date: | |
| Counsel for defendant Denis Savgir | | |
| | Date: | |
| Counsel for defendant Bakai Marat-Uulu | | |
| | Date: | |
| Counsel for defendant Andriy Petrushyn | | |
| | Date: | |
| Counsel for defendant Diego Gabisonia | | |

| ited States v. Shulaya, et al. Cr. 350 (KBF) otective Order | |
|-------------------------------------------------------------------|------------------------------|
| Counsel for defendant Avtandil Kanadashvili | Date: |
| Counsel for defendant/Aviandn Kanadashviii | Date: |
| Counsel for defendant Nazo Gaprindashvili | |
| Counsel for defendant Artur Vinokurov | Date: |
| | Date: |
| Counsel for defendant Evgheni Melman | |
| Counsel for defendant Timur Suyunov | Date: |
| Counsel for defendant Zurab Buziashvili | Date: |
| Counsel for defendant Zurau Buziasiiviii | Date: |
| Counsel for defendant Girogi Lomishvili | |
| Counsel for defendant Azer Arslanouk | Date: $\frac{\zeta/20/17}{}$ |
| | Date: |
| Counsel for defendant Ivan Afanasyev | D . |
| Counsel for defendant Denis Savgir | Date: |
| Counsel for defendant Bakai Marat-Uulu | Date: |
| Counsel for defendant Bakar Marat-Outu | Date: |
| Counsel for defendant Andriy Petrushyn | |
| Counsel for defendant Diego Gabisonia | Date: |

United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

Retention of Jurisdiction

13. The provisions of this order shall not terminate at the conclusion of this prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

JOON H. KIM Acting United States Attorney

AGREED AND CONSENTED TO:

| by: | Date: |
|--------------------------------------------------------------------|--------------------|
| Andrew C. Adams Andrew M. Thomas Assistant United States Attorneys | |
| Counsel for defendant Razhden Shulaya | Date: |
| Counsel for defendant Zurab Dzhanashvili | Date: |
| Counsel for defendant Akaki Ubilava | Date: |
| Counsel for defendant Flamlet Uglaya | Date: |
| Counsel for defendant Mamuka, Chaganava | Date: $06/21/2017$ |
| Counsel for defendant Mikheil Toradze | Date: |

United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

| | Date: |
|--------------------------------------------------------------------------------------------|--------------------------------|
| Counsel for defendant Levan Makashvili | |
| Counsel for defendant Sergey Saraidarov | Date: |
| | Date: |
| Counsel for defendant Vache/Hovhannisyan SUSAN KOMYY Counsel for defendant Denys Davydov | Date: $\frac{6202017}{}$ |
| Counsel for defendant Erekle Kereselidze | Date: |
| Counsel for defendant Alex Mitselmakher | Date: |
| Counsel for defendant Yuriy Lerner | Date: |
| Counsel for defendant Avtandil Khurtsidze | Date: |
| | |
| SO ORDERED: | |
| Dated: New York. New York , 2017 | HONORABLE KATHERINE B. FORREST |

UNITED STATES DISTRICT JUDGE

| rotective Order | | |
|-----------------------------------------|-------|--|
| Counsel for defendant Levan Makashvili | Date: | |
| Counsel for defendant Sergey Saraidarov | Date: | |
| | Date: | |

Counsel for defendant Denys Davydov

Counsel for defendant Erckle Kereselidze

Date:

Counsel for defendant Alex Mitselmakher

Date:

Counsel for defendant Yuriy Lerner

Counsel for defendant Avtandil Khurtsidze

Date:

SO ORDERED:

Dated: New York, New York

United States v. Shulaya, et al.

17 Cr. 350 (KBF)

. 2017

Counsel for defendant Vache Hovhannisyan

HONORABLE KATHERINE B. FORREST UNITED STATES DISTRICT JUDGE United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

| | Date: | |
|-------------------------------------------|--------------|-------------------------------------------------------|
| Counsel for defendant Levan Makashvili | | |
| | Date: | |
| Counsel for defendant Sergey Saraidarov | | |
| | Date: | |
| Counsel for defendant Vache Hovhannisyan | | |
| | Date: | -Amminana |
| Counsel for defendant Denys Davydov | | |
| | Date: | |
| Counsel for defendant Erekle Kereselidze | | |
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| Counsel for defendant Alex Misselmakher | . / | ſ |
| (MANILL | Date: $6/20$ | 177 |
| Counsel for defendant Yuriy Lerner | , , | |
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| Counsel for defendant Avtandil Khurtsidze | | |

SO ORDERED:

Dated: New York, New York . 2017

HONORABLE KATHERINE B. FORREST UNITED STATES DISTRICT JUDGE

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 14 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 14 of 23

United States v. Shulaya, et al. 17 Cr. 350 (KBF)

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| | Date: |
| Counsel for defendant Avtandil Kanadashvili | |
| | Date: |
| Counsel for defendant Nazo Gaprindashvili | |
| | Date: |
| Counsel for defendant Artur Vinokurov | |
| | Date: |
| Counsel for defendant Evgheni Melman | |
| | Date: |
| Counsel for defendant Timur Suyunov | |
| | Date: |
| Counselctor defendant Zurab Buziashvili | |
| | Date: $\frac{6/30/17}{}$ |
| Counsel for defendant Girogi Lomishvili | |
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| Counsel for defendant Azer Arslanouk | Approximate for the second of |
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| Counsel for defendant Ivan Afanasyev | A Company of Company o |
| | Date: |
| Counsel for defendant Denis Savgir | |
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| Counsel for defendant Bakai Marat-Uulu | |
| | Date: |
| Counsel for defendant Andriy Petrushyn | |
| | Date: |
| Counsel for defendant Diego Gabisonia | |

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 15 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 15 of 23

United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order Date: Counsel for defendant Avtandil Kanadashvili Date: Counsel for defendant Nazo Gaprindashvili Date: _____ Counsel for defendant Artur Vinokurov Date: Counsel for defendant Evgheni Melman Date: Counsel for defendant Timur Suyunov Date: Counsel for defendant Zurab Buziashvili Date: Counsel for defendant Girogi Lomishvili Date: Counsel for defendant Azer Arslanouk

Counsel for defendant Ivan Afanasyev

Date:

Counsel for defendant Denis Savgir

Date:

Date:

Counsel for defendant Bakai Marat-Uulu

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Counsel for defendant Andriy Petrushyn

Date:

Counsel for defendant Diego Gabisonia

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 16 of 23 Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 16 of 23

United States v. Shulaya, et al.

17 Cr. 350 (KBF) Protective Order

Date: Counsel for defendant Levan Makashvili Date: Counsel for defendant Sergey Saraidarov Date: Counsel for defendant Vache Hovhannisyan Date: Counsel for defendant Denys Davydov Date: Counsel for defendant Erekle Kereselidze Date: 6 - 20 - 17 Counsel for defendant Alex Mitselmakher Date: Counsel for defendant Yuriy Lerner Date: Counsel for defendant Aytandil Khurtsidze SO ORDERED: Dated: New York, New York

HONORABLE KATHERINE B. FORREST UNITED STATES DISTRICT JUDGE

.2017

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 17 of 23 Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 17 of 23

United States v. *Shulaya*, et al. 17 Cr. 350 (KBF) Protective Order

Retention of Jurisdiction

13. The provisions of this order shall not terminate at the conclusion of this prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

AGREED AND CONSENTED TO:

JOON H. KIM Acting United States Attorney

| Date: |
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| Date: |
| Date: 6/21/17 |
| Date: |
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Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 18 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 18 of 23

United States v. *Shulaya, et al.* 17 Cr. 350 (KBF) Protective Order

| Counsel for defendant Avtandil Kanadashvili | Date: | |
|---------------------------------------------|------------|--------|
| Counsel for defendant Nazo Gaprindashvili | Date: June | 21,201 |
| Counsel for defendant Artur Vinokurov | Date: | |
| Counsel for defendant Evgheni Melman | Date: | |
| Counsel for defendant Timur Suyunov | Date: | |
| Counsel for defendant Zurab Buziashvili | Date: | |
| Counsel for defendant Girogi Lomishvili | Date: | |
| Counsel for defendant Azer Arslanouk | Date: | |
| Counsel for defendant Ivan Afanasyev | Date: | |
| Counsel for defendant Denis Savgir | Date: | |
| Counsel for defendant Bakai Marat-Uulu | Date: | |
| Counsel for defendant Andriy Petrushyn | Date: | |
| Counsel for defendant Diego Gabisonia | Date: | |

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 19 of 23 Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 19 of 23

United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

| | Date: | |
|---------------------------------------------|---------|----------|
| Counsel for defendant Avtandil Kanadashvili | | |
| Counsel for defendant Nazo Gaprindashvili | Date: | |
| Counsel for defendant Nazo Gaprindasiiviii | Data | |
| Counsel for defendant Artur Vinokurov | Date: _ | |
| fry Wh- | Date: | 6-20-17 |
| Counsel for defendant Evgheni Melman | Die | |
| Counsel for defendant Timur Suyunov | Date: _ | V |
| | Date: | |
| Counsel for defendant Zurab Buziashvili | D 4 | |
| Counsel for defendant Girogi Lomishvili | Date: | |
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| Counsel for defendant Azer Arslanouk | Data | |
| Counsel for defendant Ivan Afanasyev | Date: | |
| Counsel for defendant Denis Savgir | Date: _ | |
| Counsel for defendant Denis Savgir | Datas | |
| Counsel for defendant Bakai Marat-Uulu | Date: _ | |
| Council for defendent Andrie Petrophyn | Date: _ | |
| Counsel for defendant Andriy Petrushyn | Data | |
| Counsel for defendant Diego Gabisonia | Date: _ | |

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 20 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 20 of 23

United States v. Shulaya, et al.

| Cr. 350 (KBF) | |
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| | Date: |
| Counsel for defendant Artur Vinokurov | |
| Counsel for defendant Evgheni Melman | Date: |
| Counsel for detendant Lygnem Meman | Date: |
| Counsel for defendant Timur Suyunov | Date. |
| | Date: |
| Counsel for defendant Zurab Buziashvili | _ |
| Counsel for defendant Girogi Lomishvili | Date: |
| | Date: |
| Counsel for defendant Azer Arslanouk | |
| Counsel for defendant Ivan Afanasyev | Date: |
| | Date: |
| Counsel for defendant Denis Savgir | |
| Counsel for defendant Bakai Marat-Uulu | Date: |
| /S/ Arnold J. Levine | Date: June 20, 2017 |
| /S/ Arnold J. Levine Counsel for defendant Andriy Petrushyn | |
| Counsel for defendant Diego Gabisonia | Date: |
| | Date: |
| Counsel for defendant Levan Makashvili | |
| Counsel for defendant Sergey Saraidarov | Date: |

United States v. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

Retention of Jurisdiction

13. The provisions of this order shall not terminate at the conclusion of this prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

JOON H. KIM Acting United States Attorney

AGREED AND CONSENTED TO:

| r: | Date: |
|------------------------------------------|---------------------|
| Andrew C. Adams | |
| Andrew M. Thomas | |
| Assistant United States Attorneys | |
| Counsel for defendant Razhden Shulaya | Date: Jane 20, 2017 |
| Counsel for defendant Raznden Shulaya | |
| | Date: |
| Counsel for defendant Zurab Dzhanashvili | |
| | Date: |
| Counsel for defendant Akaki Ubilava | |
| | Date: |
| Counsel for defendant Hamlet Uglava | |
| | Date: |
| Counsel for defendant Mamuka Chaganava | |
| | Date: |
| Counsel for defendant Mikheil Toradze | |

United States V. Shulaya, et al. 17 Cr. 350 (KBF) Protective Order

Retention of Jurisdiction

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AGREED AND CONSENTED TO:

JOON H. KIM Acting United States Attorney

| by: | Date: |
|-------------------------------------------------------------------------|---------------|
| Andrew C. Adams Andrew M. Thomas Assistant United States Attorneys | |
| | Date: |
| Counsel for defendant Razhden Shulaya | |
| | Date: |
| Counsel for defendant Zurab Dzhanashvili | |
| | Date: |
| Counsel for defendant Akaki Ubilava Counsel for defendant Hamlet Uglava | Date: 6/20/17 |
| | Date: |
| Counsel for defendant Mamuka Chaganava | |
| | Date: |
| Counsel for defendant Mikheil Toradze | |

Case 1:17-cr-00350-KBF Document 144 Filed 06/27/17 Page 23 of 23

Case 1:17-cr-00350-KBF Document 138-1 Filed 06/23/17 Page 22 of 23

| United States v. Shulaya. | et | al |
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| 17 Cr. 350 (KBF) | | |
| Protective Order | | |

| | Date: | |
|-------------------------------------------|-------|--------|
| Counsel for defendant Levan Makashvili | | |
| <u> </u> | Date: | 2/2/17 |
| Counsel for defendant Semyon Saraidarov | | |
| | Date: | |
| Counsel for defendant Vache Hovhannisyan | | |
| | Date: | |
| Counsel for defendant Denys Davydov | | |
| | Date: | |
| Counsel for defendant Erekle Kereselidze | | |
| | Date: | |
| Counsel for defendant Alex Mitselmakher | | |
| - | Date: | |
| Counsel for defendant Yuriy Lerner | | |
| | Date: | |
| Counsel for defendant Avtandil Khurtsidze | | |

SO ORDERED:

Dated: New York, New York

June 27, 2017

HONORABLE KATHERINE B. FORREST UNITED STATES DISTRICT JUDGE